

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**LEHMAN BROTHERS HOLDINGS INC., *et al.*,  
  
Debtors.**

**Chapter 11**

**Case No. 08-13555-scc**

**[PROPOSED] ORDER TO SHOW CAUSE**

This matter having come before this Court by the *ex parte* application (the “Application”) of Republic State Mortgage Company, for the entry of an order to show cause, granting a stay, and setting a hearing for May 7, 2015 on Republic State Mortgage Company’ motion (“Motion”) for entry of an order pursuant to *Rule 60(b)(6)* of the *Federal Rules of Civil Procedure* seeking to vacate the “Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller, Republic State Mortgage Company” (the “Order”) and the Court having considered the Application, and for good cause shown, it is hereby:

**ORDERED**, that the Defendants show cause before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, Room 623, New York, NY 10004-1408, on the 7th day of May , 2015 at 10:00 a.m., or as soon thereafter as counsel can be heard, why an order should not be issued and entered vacating the Order; and it is further

**ORDERED** that LBHI and Republic State Mortgage Company obligation to attend mediation in New York or retain a LBHI chosen mediator is hereby stayed pending the entry of a further order by this Court; and is further

**ORDERED** that service of a copy of this Order and Motion shall be made upon Wollmuth Maher & Deutsch LLP, counsel for LBHI by express overnight mail no later than\_\_\_\_\_, 2015, which service shall be deemed good and sufficient service thereof; and it is further

**ORDERED** that to the extent LBHI desires to respond to the Motion, such response must be served on American Mortgage Law Group, counsel for Republic State Mortgage Company, no later than \_\_\_\_\_, 2015; and it is further

**ORDERED** that the reply papers of Republic State Mortgage Company, if any, must be served on or before  
\_\_\_\_\_, 2015.

Dated: March \_\_ , 2015

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UNITED STATES  
BANKRUPTCY JUDGE